UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

KATHY TOWNSEND GRIFFIN, et.al.,

Plaintiffs,

VS.

ECF CASE

17-CV-5221 (LIS)

EDWARD CHRISTOPHER SHEERAN, et.al.,

Defendants.

NOTICE OF MOTION— PLAINTIFFS' FOURTH

MOTION IN LIMINE

PLEASE TAKE NOTICE, that upon the accompanying Memorandum of Law, and all prior proceedings had herein, the enumerated Plaintiffs, collectively, will move this Court, before the Honorable Louis L. Stanton, at the Daniel Patrick Moynihan United States Courthouse, Courtoom 21C, 500 Pearl Street, New York, New York, 10007, on a date and time to be determined by the Court, for an Order excluding the proffered deposition testimony of Helen McDonald.

The reasons and grounds for this motion are more fully described in the accompanying papers.

Oral argument, if any shall be directed by the Court, shall be held on a date and at a time designated by the Court.

DATED this 15th day of March, 2023.

FRANK & RICE, P.A.

Respectfully Submitted:

/s/ Patrick R. Frank, Esq. Patrick R. Frank, Esq.

Florida Bar Number: 0642770 Keisha D. Rice, Esq. Katherine L. Viker, Esq. Frank & Rice, P.A. 325 West Park Avenue Tallahassee, Florida 32301 Telephone: (850) 629-4168

Facsimile: (850) 629-4184